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December 4, 2024

**Via ECF**

Honorable Patrica M. Mayer, USBJ  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, 4th Floor  
Reading, PA 19601

RE: Wayne R. Trotman  
Case No.: 22-11225-PMM  
Objection to Sale Returnable: Wednesday, December 11, 2024 at 9:30 am

Dear Judge Mayer:

Our firm represents the non-debtor ex-spouse, Victoria Watts-Trotman. Please accept this letter as our limited objection to the proposed sale. This bankruptcy has been pending for nearly two and half years. The Debtor finally filed a plan of reorganization that was scheduled for confirmation on November 20<sup>th</sup> but filed this sale motion Sunday evening November 17, 2024 alleging necessity of an adjournment of the confirmation. The Debtor has now filed a Modified Plan scheduled for hearing January 8, 2025.

My client would not object to the fairness of the \$1.5 million dollar purchase price. My client requests that her Domestic Support Obligation claim be paid from the net proceeds of closing, if any. My client initially filed claim #6 on July 25, 2022, in the amount of \$219,898.53. The claim was amended on July 26, 2024 to include an additional \$25,000.00 that was to be paid to my client from the sale of the marital residence. Attached to the claim was the Consent Order between the parties in the Matrimonial Court dated May 25, 2017, providing that my client would receive a \$25,000.00 payment by April 5, 2018, or upon sale of the home, whichever is sooner. To date, this payment has not been made. I received the Debtor's October Monthly Operating Report. The Debtor has stopped making mortgage payments in October, and therefore, reducing or eliminating the possibility of net proceeds at sale for distribution to my client. I would, therefore, respectfully request that the form of order be amended to provide that any net proceeds of sale be utilized to pay the Domestic Support Obligation Claim that my client has so patiently been waiting for payment.

Respectfully submitted,

/s/ Allen I. Gorski

Allen I. Gorski

AIG/jjf

cc: Diana M. Dixon, Esquire  
Kevin P. Callahan, Esquire  
Daniel Adams, Esquire  
Jennifer Millner, Esquire  
Victoria Trotman